

IRWIN, CAMPBELL & TANNENWALD, P.C.

ATTORNEYS AT LAW
1730 RHODE ISLAND AVENUE, N.W.
SUITE 200
(202) 728-0400
FAX (202) 728-0354
<http://www.ictpc.com>

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GREGORY V. HALEDJIAN (NOT ADMITTED IN DC)
DIRECT LINE: (202) 777-3972
ghaledjian@ictpc.com

JUN 29 2004

June 29, 2004

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: State Long Distance Telephone Company, TRS No. 801561
New Payphone Compensation Rules, CC Docket No. 96-128
Declaration That It Is Not A "Completing Carrier"

Dear Ms. Dortch:

Enclosed and filed on behalf of State Long Distance Telephone Company (SLD, TRS No. 801561) is SLD's affirmative declaration that certain portions of the Federal Communications Commission's new payphone compensation rules, that become effective on July 1, 2004, do not apply to SLD because SLD is a local exchange carrier (LEC) that does not meet the definition of a "Completing Carrier," as defined in the new rules pursuant to 47 C.F.R. § 64.1300(a). Because SLD does not meet the definition of a "Completing Carrier," it does not have to comply with the requirements of 47 C.F.R. § 64.1310(a) or (g), or with the requirements of 47 C.F.R. § 64.1320.

Please date stamp the enclosed "File Copy" and return it to the undersigned in the enclosed self-addressed stamped envelope. Should you have any questions concerning this request, please contact the undersigned.

Very truly yours,


Gregory V. Haledjian

Enclosure

cc: Denise Coca, Competition Policy Division, Wireline Competition Bureau, FCC

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**DECLARATION OF
STATE LONG DISTANCE TELEPHONE COMPANY**

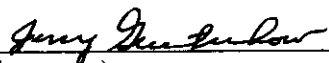
On October 3, 2003, the Federal Communications Commission (FCC) released a Report and Order (R&O, FCC 03-235), in response to a remand from the United States Court of Appeals for the District of Columbia Circuit (315 F.3d 369). This R&O becomes effective on July 1, 2004 (*see* FCC Public Notice, DA 04-1309, May 11, 2004) and its purpose is to finalize a federalized payphone compensation scheme that has been in the works since 1996.

Certain portions of the FCC's new payphone compensation rules do not apply to State Long Distance Telephone Company (SLD) because SLD is a local exchange carrier (LEC) that does not meet the definition of a "Completing Carrier." Pursuant to 47 C.F.R. § 64.1300(a), a LEC would meet the definition of a "Completing Carrier" under the new rules only if it "completes a local, coinless access code or subscriber toll-free payphone call."

SLD is a small rural independent LEC based in Elkhorn, Wisconsin. It currently provides seventy six (76) payphone lines to twenty seven (27) payphone service providers in its service area. In no instance does SLD carry local coinless payphone calls completely within its telephone plant from origination at the payphone to termination at the phone number of the LEC's local customer. All coinless payphone calls (both local and toll) are transmitted from the payphone terminal to SLD's central office and then these calls are automatically routed to the toll provider (the long distance carrier, switched-based reseller or operator services provider) assigned to the access code or toll-free number being dialed. Once a coinless payphone call leaves SLD's central office, the toll provider controls the routing of the call to termination. As a result, it is not possible for SLD to complete a local, coinless access code or subscriber toll-free payphone call. Therefore, SLD does not meet the definition of a "Completing Carrier" under the FCC's payphone compensation rules and it does not have to comply with the requirements of 47 C.F.R. § 64.1310(a) or (g), and with the requirements of 47 C.F.R. § 64.1320.

I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by State Long Distance Telephone Company to provide this Declaration.

Date: June 28, 2004


(signature)

Jerry Guetschow
(printed name)

Secretary & Treasurer
(title)

State Long Distance Telephone Company
216 W. Walworth Street
Elkhorn, Wisconsin 53121
262-723-5300